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10 UNITED STATES BANKRUPTCY COURT  
11 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

12 In Re:  
13 SONIA LOPEZ  
14 Debtor

15 Case No. 23-10947-A-13F

16 Chapter 13

17 SONIA LOPEZ  
18 Plaintiff

19 Adversary No. 23-01039

20 Unified Mortgage Service, Inc.; and Brilena,  
21 Inc.; and Michael Bumbaca and Adele  
22 Bumbaca; and Equity Trust Company  
Successor in Interest to First Regional  
Bank as Custodian FBO Robert Pastor IRA  
Acct. No 051236; and Equity Trust  
Company as Custodian FBO Charles A.  
Gurule Jr. IRA Account #T058685; and  
Robert C. Edwards; and Equity Trust  
Company Custodian FBO Robert B. Pastor  
IRA Account#T058686; and Capital Benefit  
Mortgage, Inc.

23 Defendants

24 JOINT REPORT OF PARTIES' DISCOVERY  
25 CONFERENCE

26 STATUS CONFERENCE  
27 DATE: November 30, 2023  
28 TIME: 11:00 AM  
PLACE: Dept. A. Ctrm 11, 5th Flr  
US Courthouse  
2500 Tulare St., Fresno, CA  
JUDGE: Hon. Jennifer E. Niemann

26 Plaintiff and Defendants, by and through their respective undersigned counsel,  
27 hereby submit the following Joint Status Conference Statement:  
28

1       1. Plaintiff's complaint was filed on September 21, 2023. An Answer to this  
2       Complaint was filed on October 19, 2023. An Amended Answer was filed by Defendants,  
3       except Capital Benefit Mortgage, Inc., on October 20, 2023.

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5       2. An Order to Show Cause regarding Defendant's failure to file Corporate  
6       Disclosure Statements is set to be heard on November 30, 2023.

7       3. Discovery Conference. The undersigned have conferred telephonically pursuant  
8       to Rule 26 and have discussed initial disclosures.

9  
10       4. Settlement. The parties have not yet discussed settlement. Each is amenable to  
11       doing so and will also explore and consider mediation.

12       5. Discovery Plan: The parties acknowledge that much of the documentary  
13       evidence to be relied on in this case is already found in the court records for each of Plaintiff's  
14       prior bankruptcy cases, including the current one. The parties also suggest that it makes sense to  
15       limit discovery to one set of Interrogatories, Request for Admissions and Request for Production  
16       for Defendants as a unit to avoid repetitive and/or duplicative discovery requests from each of  
17       the Defendants. Conversely, in view of the blanket denial provided in Defendants' Answer,  
18       Plaintiff will be allowed to propound interrogatories pursuant to FRBP 7033(a) (1) in excess of  
19       25 but no more than 50 without further leave of Court. The parties submit the following  
20       discovery schedule, subject to the approval of the Court:

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22       a. Initial Disclosures pursuant to FRCP 26(a)(1)(A)-December 29, 2023  
23  
24       b. Disclosure of Experts and Expert Witness Reports- February 16, 2024  
25  
26       c. Close of Fact Discovery-April 5, 2024  
27  
28       d. Deadline for Dispositive Motions-May 20, 2024

- e. Plaintiff's Pre-Trial Statement May 28, 2024
- f. Defendants' Pre-Trial Statement June 4, 2024
- g. Pre-Trial Conference June 11, 2024

Dated: November 25, 2023

## SILVEIRA LAW OFFICES

By/s/ Susan D. Silveira  
Susan D. Silveira, Plaintiff

Dated November 25, 2023

## LAW OFFICES OF EDWARD T. WEBER

By:/s/Edward T. Weber (per email authorization)  
Edward T. Weber, Defendants